

**U.S. Department of Justice***United States Attorney  
Eastern District of New York*

FJN/RMP/LAB/AA/RU  
F. #2009R01065/OCDETF#NY-NYE-616

271 Cadman Plaza East  
Brooklyn, New York 11201

June 11, 2025

By ECF and E-Mail

The Honorable Brian M. Cogan  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Ismael Zambada Garcia  
Criminal Docket No. 09-466 (BMC) (S-5)

Dear Judge Cogan:

The government respectfully writes on behalf of the parties to request that the status conference currently scheduled for June 16, 2025 be adjourned for approximately 60 days or until a date convenient for the Court thereafter, and that time until such date be excluded from calculations under the Speedy Trial Act in the interests of justice. As the Court is aware, the parties have exchanged certain discovery materials and discussed the potential for a resolution short of trial, which has occurred during the pendency of the capital case process and the government's assessment of the likelihood and scope of proceedings pursuant to the Classified Information Procedures Act ("CIPA"). The government has determined that CIPA proceedings are likely although its determination of the scope of such proceedings remains ongoing, and the parties still await the conclusion of the capital case determination. In light of all of those considerations, the parties jointly request that the conference be adjourned for approximately 60 days or to a convenient date thereafter. Additionally, the parties jointly ask that time be

excluded for the above reasons and respectfully submit that the interests of justice served by the adjournment and exclusion of time outweigh the interests of the public and the defendant in a speedy trial.

Respectfully submitted,

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